

Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

NORTHWEST SCHOOL OF SAFETY, a
Washington sole proprietorship, PUGET
SOUND SECURITY, INC., a Washington
corporation, PACIFICA NORTHWEST
ASSOCIATION OF INVESTIGATORS, INC.,
a Washington corporation, FIREARMS
ACADEMY OF SEATTLE, INC., a
Washington corporation, DARRYL LEE, XEE
DEL REAL, JOE WALDRON, GENE
HOFFMAN, ANDREW GOTTLIEB, ALAN
GOTTLIEB, GOTTLIEB FAMILY
REVOCABLE LIVING TRUST, a Washington
trust, and SECOND AMENDMENT
FOUNDATION, a non-profit organization,

Plaintiffs,

v.

BOB FERGUSON, Attorney General of
Washington (in his official capacity),
WASHINGTON ATTORNEY GENERAL'S
OFFICE, and JOHN R. BATISTE, Chief of the
Washington State Patrol (in his official
capacity), and DOES I-V,

Defendants.

No. 3:14-cv-6026 BHS

DECLARATION OF ZACH SILK IN
SUPPORT OF CHERYL STUMBO,
WASHINGTON ALLIANCE FOR GUN
RESPONSIBILITY, AND
EVERYTOWN FOR GUN SAFETY
ACTION FUND FOR I-594'S MOTION
TO INTERVENE

DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,
WAGR, AND EVERYTOWN'S MOTION TO INTERVENE - 1
Case No. 3:14-cv-6026 BHS

20085 00004 eb135e074v.003

PACIFICA LAW GROUP LLP
1191 SECOND AVENUE
SUITE 2000
SEATTLE, WASHINGTON 98101-3404
TELEPHONE: (206) 245.1700
FACSIMILE: (206) 245.17500

1 I, ZACH SILK, declare as follows:

2 1. I am over the age of 18, am competent to testify, and offer this declaration based
3 on my personal knowledge.

4 2. I was the Campaign Manager of the Washington Alliance for Gun Responsibility
5 ("WAGR"). WAGR is a 501(c)(4) nonprofit organization formed in January 2013 and
6 headquartered in Seattle, Washington. WAGR is a coalition of citizens and organizations
7 working together to find solutions to reduce gun violence.
8

9 3. WAGR was the driving force behind Initiative 594 ("I-594" or "Initiative"),
10 which closed the background check loophole for sales and transfers of guns in Washington State.

11 4. One of WAGR's organizational goals is to keep guns out of the hands of
12 individuals legally prohibited from possessing them, including felons and persons courts have
13 determined are dangerously mentally ill. In its work on I-594, WAGR focused on closing the
14 background check loophole to further this organizational goal.
15

16 5. In early 2013, WAGR drafted I-594 as an initiative to the Washington State
17 Legislature.

18 6. On June 11, 2013, WAGR filed I-594 with the Washington Secretary of State.
19 Cheryl Stumbo served as the official Citizen-Sponsor of the Initiative.

20 7. On July 1, 2013, WAGR and Ms. Stumbo filed an appeal of the Washington
21 Attorney General's proposed ballot title for I-594. WAGR and Ms. Stumbo did not believe the
22 proposed title met their intent in drafting the Initiative. WAGR and Ms. Stumbo briefed the
23 issue and presented oral argument to the trial court.
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25
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1 8. After the trial court issued the final ballot title, WAGR circulated petitions and
2 gathered sufficient citizen signatures to qualify I-594 for presentation to the Washington State
3 Legislature, and ultimately to the people for a vote. WAGR submitted 346,834 signatures, well
4 in excess of the number required. *See* [http://www.sos.wa.gov/_assets/elections/initiatives/](http://www.sos.wa.gov/_assets/elections/initiatives/Top25.pdf)
5 [Top25.pdf](http://www.sos.wa.gov/_assets/elections/initiatives/Top25.pdf) (last visited Feb. 20, 2015).
6

7 9. WAGR worked with Ms. Stumbo and Everytown for Gun Safety Action Fund for
8 I-594 (“Everytown for I-594”) during the 2014 legislative session to have the Legislature
9 approve I-594. To that end, WAGR presented testimony to the Legislature on the importance of
10 closing the background check loophole.

11 10. When the Legislature did not act on I-594, the Initiative was placed on the
12 November 4, 2014 general election ballot. WAGR registered with the Washington State Public
13 Disclosure Commission as the primary I-594 ballot committee.
14

15 11. WAGR worked closely with Ms. Stumbo, Everytown for I-594 and its partners in
16 spearheading the campaign to pass I-594. WAGR was the primary campaign committee working
17 in support of I-594. WAGR’s campaign activities included significant fundraising, get-out-the-
18 vote efforts, speaking at public events, debates, and media interaction. WAGR engaged
19 thousands of Washingtonians in meaningful volunteer work, including making tens of thousands
20 of phone calls and thousands of door visits to Washington voters across the state. WAGR also
21 directly communicated with Washington voters through direct mail, digital and television
22 advertising making the case for I-594. WAGR and its representatives were also the primary
23 agent arguing for I-594 in the media, at forums and at editorial board interviews.
24

25 I declare under penalty of perjury of the laws of the State of Washington that the
26

1 foregoing is true and correct.

2 DATED this 20 day of February, 2015, signed in SEATTLE, Washington.

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Zach Silk

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DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,
WAGR, AND EVERYTOWN'S MOTION TO INTERVENE - 4
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2015, I electronically filed the foregoing document with the United States District Court ECF system, which will send notification of such filing to the following:

David B. Edwards
Steven W. Fogg
Corr Cronin Michelson Baumgardner & Preece
1001 4th Avenue
Suite 3900
Seattle, WA 98154-1051
Phone: 206.625.8600
Email: dedwards@corrchronin.com
Email: sfogg@corrchronin.com

Mikolaj T. Tempski
Tempski Law Firm PS
40 Lake Bellevue
Suite 100
Bellevue, WA 98005
Phone: 425.998.6203
Email: Miko@TempskiLaw.com

Attorneys for Plaintiffs

Attorneys for Plaintiffs

Jeffrey T. Evan
Noah Purcell
R. July Simpson
Rebecca Ripoli Glasgow
Solicitor General
Washington State Attorney General's Office
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
Phone: 360-753-6200
Email: noahp@atg.wa.gov
Email: jeffe@atg.wa.gov
Email: RJJulyS@atg.wa.gov
Email: RebeccaG@atg.wa.gov

Attorneys for Defendants

Signed at Seattle, Washington this 23rd day of February, 2015.


Dawn M. Taylor

DECLARATION OF ZACH SILK IN SUPPORT OF STUMBO,
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